

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

Harris, Symonous-Greta Ex Relatione and  
Authorized Representative for: SYMONOUS  
HARRIS, ET AL.,

Claimant,

v.

BNC MORTGAGE, INC., WELLS FARGO  
GANK, N.A. DBA AMERICA'S SERVICING  
COMPANY, N.A., DBA AMERICA'S  
SERVICING COMPANY, LEHMAN  
BROTHERS HOLDING, INC., U.S. BANK  
NATIONAL ASSOCIATION, AURORA  
LOAN SERVICES, LLC, DEUTSCHE BANK  
NATIONAL TRUST COMPANY,  
STRUCTURED ASSETS INVESTMENT  
LOAN TRUST, STRUCTURED ASSET  
SECURITIES CORPORATION, ET AL, AND  
ALL OTHER PARTIES OF INTEREST 1-50  
JOHN and JANE DOES all persons unknown,  
claiming any legal or equitable right, title,  
estate, lien, or interest in the property described  
in the complaint adverse to plaintiff's title or  
any cloud on plaintiff's title thereto,

Respondent(s).

CIVIL ACTION

No. 16-cv-2126(MKB)(PK)

**CERTIFICATION OF COUNSEL IN  
SUPPORT OF MOTION TO DISMISS**

I, William C. Sandelands, of full age, hereby certify that:

1. I am an attorney duly admitted to practice law before this Court and am a partner of the law firm of Sandelands Eyet LLP, counsel for defendants BNC Mortgage, Inc. ("BNC"), Lehman Brothers Holding, Inc. ("LBHI"), Aurora Loan Services LLC ("Aurora") and Structured Asset Securities Corporation ("SASCO") (collectively "Defendants") in the above-captioned matter. I am fully familiar with the facts and circumstances of this matter, having reviewed my file, as well as the docket for this case and related matters, and other pertinent information and documents.

2. I submit this Certification in support of Defendants' Motion for an Order Dismissing Plaintiffs' Complaint, With Prejudice, pursuant to Rules 12(b)(1) and 12(b)(6) of the Federal Rules of Civil Procedure.

3. Annexed hereto as **Exhibit A** is a true and correct copy of the Order of Reference filed on March 1, 2016 in the state court matter, U.S. Bank National Association v. Harris, et al, Supreme Court of New Jersey, County of Kings, Index No. 20269/2009.

4. Annexed hereto as **Exhibit B** is a true and correct copy of the Order entering Default Judgment filed on March 1, 2016 in the state court matter, U.S. Bank National Association v. Harris, et al, Supreme Court of New Jersey, County of Kings, Index No. 20269/2009.

5. Annexed hereto as **Exhibit C** is a true and correct copy of the Order Confirming Modified Third Amended Joint Chapter 11 Plan of Lehman Brothers Holdings, Inc. and its Affiliated Debtors, filed on December 6, 2011 in the matter In re Lehman Brothers Holdings, Inc., et al., United States Bankruptcy Court, Southern District of New York, Docket No.: 08-13555.

Dated: Bedminster, New Jersey  
July 22, 2016

By: /s/ William C. Sandelands  
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